

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROCHE CYRULNIK FREEDMAN LLP,

Plaintiff,

v.

JASON CYRULNIK,

Defendant.

JASON CYRULNIK,

Counterclaim-Plaintiff,

v.

ROCHE CYRULNIK FREEDMAN LLP,
KYLE ROCHE, DEVIN FREEDMAN, AMOS
FRIEDLAND, NATHAN HOLCOMB, and
EDWARD NORMAND,

Counterclaim-Defendants.

Case No. 1:21-cv-01746-JGK

NOTICE OF MOTION

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the attached Statement of Undisputed Material Facts, the accompanying Declaration of Jason Cyrilnik, dated June 9, 2023, the exhibits attached thereto, the Declaration of Paul Fattaruso, dated June 9, 2023, and upon all papers and proceedings herein, Defendant/Counterclaim-Plaintiff Jason Cyrilnik (“Cyrulnik”), by and through his undersigned counsel, hereby moves this Court, before the Honorable John G. Koeltl, at the United States Courthouse for the Southern District of New York, 500 Pearl St., Courtroom 14A, New York, New York 10007, as soon as counsel may be heard, for an Order granting Cyrilnik’s motion for summary judgment pursuant

to Federal Rule of Civil Procedure 56, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
June 9, 2023

Respectfully submitted,

KASOWITZ BENSON TORRES LLP

By: /s/ Marc E. Kasowitz

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